

LAW OFFICES OF MALLON & TRANGER

86 Court Street
Freehold, NJ 07728
Telephone: (732) 780-0230
Facsimile: (732) 780-5002
Attorneys for Plaintiff, John P. Saddy

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
TRENTON VICINAGE**

JOHN P. SADDY	:	Civil No. 18-16137
	:	(FLW/LHG)
Plaintiff,	:	
	:	Civil Action
v.	:	
	:	
BOROUGH OF SEASIDE HEIGHTS;	:	
CHRISTOPHER VAZ , Seaside Heights Borough:	:	
Administrator; ANTHONY E. VAZ ,	:	PLAINTIFF'S ANSWER
Seaside Heights Mayor; RICHARD TOMPKINS ;	:	TO DEFENDANT
MICHAEL CARBONE ; LOUIS DiGULIO ;	:	BOROUGH OF SEASIDE
AGNES POLHEMUS ; HARRY SMITH ;	:	HEIGHTS' COUNTERCLAIM
VICTORIA GRAICHEN , Seaside Heights	:	FOR ATTORNEY'S FEES
Council members; KENNETH ROBERTS ,	:	
Zoning Officer;	:	
CHARLES LASKEY , Building Inspector;	:	
THOMAS BOYD , Chief of Police;	:	
SERGEANT LUIGI VIOLANTE , a Seaside	:	
Heights police officer; JOHN DOES 1-10 ,	:	
Seaside Heights police officers; and	:	
JOHN DOES 11-20 , Seaside Heights	:	
Council Members; Municipal Employees;	:	
Officials; and/or Appointees,	:	
	:	
Defendants.	:	

Plaintiff, John P. Saddy, hereby answers the Counterclaim for Attorney's Fees asserted by Defendant, Borough of Seaside Heights, as follows:

1. Plaintiff denies that the allegations contained in his complaint or any amended complaint as to Defendant, Borough

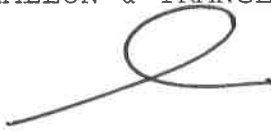
of Seaside Heights, are frivolous, groundless, and without merit.

2. Neither admitted nor denied as the statement is a legal conclusion to which no response is required.

WHEREFORE, it is requested that relief and judgment be entered in favor of Plaintiff and against Defendant, including, but not limited to, for reasonable attorney's fees, costs of suit, and such other relief as the Court deems equitable and just.

MALLON & TRANGER

By:



SURINDER K. AGGARWAL

Dated: March 21, 2019

CERTIFICATION OF SERVICE

The undersigned hereby certifies as follows:

1. I am an attorney licensed to practice law in the State of New Jersey and admitted to the United States District Court for the District of New Jersey. I am an associate employed by the Law Offices of Mallon & Tranger, which represents Plaintiff, John P. Saddy, in the above-captioned matter.
2. On the 21st day of March, 2019, I served Plaintiff's Answer to Defendant, Borough of Seaside Heights' Counterclaim for Attorney's Fees via ECF upon all counsel of record.

I certify that the foregoing statements made by me are true and correct. I am aware that if any of the statements made by me are willfully false, I am subject to punishment.



SURINDER K. AGGARWAL

Dated: March 21, 2019